

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

NOEL GEORGE CAMPBELL,  
 a/k/a "Howard Brooks,"

Defendant.

- - - - - X **11 CRIM 83**

: INDICTMENT

: 11 Cr.

:

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- - - - - X

COUNT ONE

The Grand Jury charges:


From at least on or about January 3, 2011, in the Southern District of New York and elsewhere, NOEL GEORGE CAMPBELL, a/k/a "Howard Brooks," the defendant, being an alien, after having been removed from the United States on or about July 10, 2008, unlawfully did enter, and was found in, the United States, without having obtained the express consent of the Attorney General of the United States or his successor, the Secretary for the Department of Homeland Security, to reapply for admission, and did so subsequent to a conviction for the commission of an aggravated felony, to wit, a conviction on or about December 3, 2004, in the United States District Court, Eastern District of New York, of possession with intent to

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distribute cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(ii).

(Title 8, United States Code, Sections 1326(a) & (b)(2).)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INDICTMENT

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(8 U.S.C. §§ 1326(a) & (b)(2).)

PREET BHARARA

United States Attorney.

  
PETER BILL

Foreperson.

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1-25-11  
VB  
Filed Indictment Case assigned to J. Buchwald.  
Mggs  
U.S.M.J.